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## WIRELESS TELECOMMUNICATIONS BUREAU AND OFFICE OF ENGINEERING AND TECHNOLOGY ANNOUNCE APPROVAL OF KEY BRIDGE'S ENVIRONMENTAL SENSING CAPABILITY

## **GN Docket No. 15-319**

On July 14, 2020, the Wireless Telecommunications Bureau (WTB) and the Office of Engineering and Technology (OET) (collectively, WTB/OET) of the Federal Communications Commission (Commission or FCC) approved Key Bridge Wireless LLC's (Key Bridge) Environmental Sensing Capability (ESC) for commercial operation.<sup>2</sup> Key Bridge's ESC approval was conditioned on successful resubmission and laboratory testing of the latest version of its ESC software before December 31, 2020.3 WTB has granted Key Bridge two extensions of this deadline because, as Key Bridge described in their letters requesting extensions, they were unable to access ITS's facilities due to circumstances beyond its control arising directly from the ongoing COVID-19 pandemic.<sup>4</sup>

<sup>&</sup>lt;sup>1</sup> Consistent with the 2015 Report and Order and as established in the First Wave Proposal Public Notice, all ESC operators must complete a two-stage review process prior to final certification. See Amendment of the Commission's Rules with Regard to commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354, Report and Order, 30 FCC Rcd 3959, 4064-66, paras. 359-366 (WTB/OET 2015) (2015 Report and Order); Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System (SAS) Administrator(s) and Environmental Sensing Capability (ESC) Operator(s) Applications, GN Docket No. 15-319, Public Notice, 30 FCC Red 14170, 14174-77 (WTB/OET 2015) (First Wave Proposal Public Notice).

<sup>&</sup>lt;sup>2</sup> Wireless Telecommunications Bureau and Office of Engineering and Technology Announce the Approval of an Additional Environmental Sensing Capability for the 3.5 GHz Band, GN Docket No. 15-319, Public Notice, 35 FCC Rcd 7001 (WTB/OET 2020) (Key Bridge ESC Approval PN).

<sup>&</sup>lt;sup>3</sup> Id. at 7003 ("As early as practicable, but no later than December 31, 2020, Key Bridge must resubmit its ESC running software version 1.1.0 to ITS for retesting. Following, completion of its ESC retesting, Key Bridge must submit a report to the Commission in GN Docket No. 15-319 detailing the results of such retesting. If Key Bridge's ESC does not pass the required tests, it must immediately cease operation of its ESC and all associated sensors.").

<sup>&</sup>lt;sup>4</sup> Letter from Jesse Caulfield, CEO, Key Bridge Wireless LLC to Marlene H. Dortch, Secretary, FCC, GN Docket No. 15-319 (filed Dec. 1, 2020) (requesting a six-month extension of the retesting deadline due to COVID-19 access restrictions); Wireless Telecommunications Bureau and Office of Engineering and Technology Extend the Conditional Authorization of Key Bridge's Environmental Sensing Capability, GN Docket No. 15-319, Public Notice, 35 FCC Rcd 14684, 14684 (WTB/OET 2020); Letter from Jesse Caulfield, CEO, Key Bridge Wireless LLC, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 15-319 (filed June 10, 2021) (requesting an additional sixmonth extension of the retesting deadline due to COVID-19 access restrictions); Wireless Telecommunications Bureau and Office of Engineering and Technology Extend the Conditional Authorization of Key Bridge's Environmental Sensing Capability, GN Docket No. 15-319, Public Notice, DA 21-723 (Jun. 21, 2021).

On December 24, 2021, Key Bridge submitted a letter informing the Commission that it had successfully completed testing of its ESC system.<sup>5</sup> On January 3, 2022, Key Bridge submitted its final ESC test report.<sup>6</sup> Based on these results, we find that Key Bridge has satisfied the retesting condition and is approved for full commercial operation of their ESC subject to the additional requirements and conditions set forth in the *Key Bridge ESC Approval PN*.<sup>7</sup>

By the Acting Chief, Wireless Telecommunications Bureau, and the Acting Chief, Office of Engineering and Technology.

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<sup>&</sup>lt;sup>5</sup> See Letter from Jesse Caulfield, CEO, Key Bridge Wireless LLC to Marlene H. Dortch, Secretary, FCC, GN Docket No. 15-319 (filed Dec 24, 2021)

<sup>&</sup>lt;sup>6</sup> See Letter from Timothy L. Bransford, Counsel to Key Bridge Wireless LLC to Marlene H. Dortch, Secretary, FCC, GN Docket No. 15-319 (filed January 3, 2022) (submitting Key Bridge's final ESC certification re-test results). The final report was submitted with a request for confidential treatment.

<sup>&</sup>lt;sup>7</sup> See Key Bridge ESC Approval PN at 7003-4.